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Attorney for Defendant
JESUS VASQUEZ

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	2:23-cr-00095-JAM
)	
Plaintiff,)	STIPULATION AND ORDER
)	TO CONTINUE STATUS
v.)	CONFERENCE
)	
JESUS VASQUEZ,)	
JOEL GIL-SANDOVAL,)	
)	
Defendant.)	

STIPULATION

Plaintiff, United States of America, by and through its counsel, Assistant United States Attorney Kerry Blackburn, Joel Gil-Sandoval, by and through his counsel, Clemente Jimenez, and defendant, Jesus Vasquez, by and through his counsel, Jennifer Mouzis, hereby stipulate as follows:

- 1) By previous order, this matter was set for status on January 9, 2024.
- 2) By this stipulation, defendant now moves to continue the status conference until **April 23, 2024, at 09:00 a.m.**, and to exclude time between January 9, 2024 and April 23, 2024, under Local Code T4.
- 3) The parties agree and stipulate, and request that the Court find the following:

- a) The discovery associated with this case includes over one hundred pages of reports, photos, and search warrant documents, as well as cellular phone downloads. All of this discovery has been either produced directly to counsel and/or made available for inspection and copying.
 - b) Counsel for defendants desire further time to review the discovery with their clients, research and investigate possible defenses, discuss any potential resolution with her client, research mitigating evidence, and present it to the prosecution. Mr. Jimenez was recently appointed to this matter on November 3, 2023.
 - c) Counsel for defendants believes that failure to grant the above-requested continuance would deny them the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.
 - d) The government does not object to the continuance.
 - e) Based on the above-stated findings, the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act.
 - f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of January 9, 2024 to April 23, 2024, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.
- 4) Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

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IT IS SO STIPULATED.

Dated: January 4, 2024

PHILLIP A. TALBERT
United States Attorney

By: /s/ Kerry Blackburn
KERRY BLACKBURN
Assistant United States Attorney

Dated: January 4, 2024

/s/ Clemente Jimenez
CLEMENTE JIMENEZ
Attorney for Defendant
JOEL GIL-SANDOVAL

Dated: January 4, 2024

/s/ Jennifer Mouzis
JENNIFER MOUZIS
Attorney for Defendant
JESUS VASQUEZ

ORDER

IT IS SO ORDERED.

Dated: January 04, 2024

/s/ John A. Mendez
THE HONORABLE JOHN A. MENDEZ
SENIOR UNITED STATES DISTRICT JUDGE